

Salvatore Perillo, Esq.
NEHMAD PERILLO & DAVIS, P.C.
P.O. Box 730
Somers Point, New Jersey 08244
(609) 927-1177
(SP-8248)
Attorneys for Defendant, Parkshore Development Corporation

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

PENNSYLVANIA NATIONAL MUTUAL
CASUALTY INSURANCE COMPANY,

Plaintiff,

vs.

PARKSHORE DEVELOPMENT
CORPORATION,

and

CATALINA COVE CONDOMINIUM
ASSOCIATION, INC.,

and

KEEN'S CAULKING AND
WATERPROOFING,

and

ABC CORPORATION 1 through ABC
CORPORATION X, fictitious
names,

Defendants.

Civil Action No.: 07-1331 (RBK-JS)

**NOTICE OF MOTION FOR
RECONSIDERATION PURSUANT TO
L.CIV.R. 7.1(i)**

RETURN DATE: October 17, 2008

TO: William T. Walsh, Clerk
United States District Court
District of New Jersey
Mitchell H. Cohen U.S. Courthouse
1 John F. Gerry Plaza
Camden, New Jersey 08101

Michael S. Savett, Esq.
Weber, Gallagher, Simpson, Stapleton, Fires &
Newby, LLC
1101 N. Kings Highway
Cherry Hill, NJ 08034
Attorneys for plaintiff, Pennsylvania National Mutual
Casualty Insurance Company

PLEASE TAKE NOTICE THAT, the undersigned will apply to the above named Court at the United States District Court for the District of New Jersey, Mitchell H. Cohen U.S. Courthouse, 1 John F. Gerry Plaza, Camden, New Jersey 08101, on Friday, October 17, 2008, or as soon thereafter as counsel may be heard, for an Order granting defendant's Motion for Reconsideration.

PLEASE TAKE FURTHER NOTICE THAT in support of this motion, said defendant will rely upon defendant's brief in support of defendant's Motion for Reconsideration submitted herewith.

PLEASE TAKE FURTHER NOTICE THAT in accordance with Rule 7.1(e) of the Local Rules of this Court, a proposed Order is annexed hereto.

NEHMAD PERILLO & DAVIS, P.C.

S/ Salvatore Perillo (SP8248)
SALVATORE PERILLO

Dated: September 22, 2008